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A

In the United States District Court
for the Western District of Pennsylvania

Ryan Herwin

: case # 05 - 93 ERIE

vs.

: Magistrate Judge Susan Baxter

et. William McConnell

: District Judge Sean McLaughlin

DEFENDANT'S RESPONSE TO

Plaintiff's First Request

For Production of Documents

Plaintiff requests, pursuant to Rule 34 of the Federal Rules of Civil Procedure, that defendant produce for inspection and copying the following documents:

1. The complete file pertaining to defendant's investigation of plaintiff's harassment claims in this case.
(file # SCI-A-052-03)

SEE ATTACHED SHEET FOR RESPONSES.

2. A copy of defendant's, officer Spulackis, officer Sabols, and Sergeant Roade's work schedule on and between the dates of August 5, 2003 and August 26, 2003.

EXHIBIT "B"

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A

Please take notice that the above requested documents shall be produced for inspection and copying at S.C.J. Albion. Such documents shall be xeroxed, duplicated or photocopied by defendant or his agents or employees and furnished to plaintiff within 30 days of service hereof.

12/10/05

Oppose & Resist

EXHIBIT "B"

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

RYAN KERWIN,)
)
Plaintiff,)
)
 v.) C.A. No. 05-93 E
)
LT. WILLIAM MCCONNELL,)
)
Defendant.)

DEFENDANT'S RESPONSE TO PLAINTIFF'S
FIRST REQUEST FOR PRODUCTION OF
DOCUMENTS

1. See attached SCI-A-052-03.
2. See attached assignment log for the time period specified.

Respectfully submitted,

THOMAS W. CORBETT, JR.
Attorney General


Kemal Alexander Mericli
Senior Deputy Attorney General
Attorney I.D. No. 27703


Susan J. Forney
Chief Deputy Attorney General

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Date: February 23, 2006

EXHIBIT "B"

*Defendant's Response
To Plaintiff's Request
For Documents
No. 2*

EXHIBIT "B"

POST	0600-1400	POST	0800-1600/0830-1630	PASSDAYS: A , B
SHIFT COMMANDER	CAPTAIN ORR	INTELLIGENCE CAPTAIN	CAPTAIN WEAVER	LTS BALOS, FRANZ
ALT SHIFT COMMANDER	CAPTAIN MILLER	MISC. CAPTAIN	CAPTAIN DIPASQUA	SGT'S T. THOMAS,
CONTROL LIEUTENANT	LT. BROCKLEHURST	SECURITY LIEUTENANT	LT. TOMER	ROBERTSON, PALKO,
LIEUTENANT 6-2	LT. OVERMYER	TRAINING LIEUTENANT		FARVER, SEVERO,
RHU LIEUTENANT	LT. MORROW	ZONE LIEUTENANT	LT. STATES	FROMM,
CONTROL SERGEANT	SGT. E. JONES	ZONE LIEUTENANT		CO1'S R. REYNOLDS,
CONTROL	HOOVER	ZONE LIEUTENANT		SHOULDERS, MOORE,
TRAINING SERGEANT	SGT. MARENDO	RHU EXERCISE	J. W. McDONALD	GOULD, FAILS, GOLDEN,
UNIT A SERGEANT	[REDACTED]	RHU EXERCISE	SEIGWORTH	CIMPERMAN, AVERILL,
UNIT A(A)	RYAN / KENNEDY P2	RHU EXERCISE	GRIFFIN	PALMER, GALENA,
UNIT A(B)	WEAVER	RHU EXERCISE	MCNERNEY	VANTASSEL, BUCKLEY,
UNIT B SERGEANT	SGT. KUBANEY	RHU EXERCISE	HARMON	WERNICKI, SISSEM, CHAPIN,
UNIT B(A)	FIES	ED. LOBBY	LOBDELL	HEIGHS, KIRIN,
UNIT B(B)	NAGEOTTE	ED. ROVER	O'BRIEN P3 6-2	COLLINGWOOD, R. PETERSON
UNIT C SERGEANT	SGT. BEDDICK	ACTIVITIES		COT RICHARDS
UNIT C(A)	BROMLEY	MAINTENANCE/CI ROVER	SCHLOSSER	SGT. McDONALD,
UNIT C(B)	SWIFT	COMM/DIETARY ROVER	WALLACE	CO1'S DAVISON, SULLIVAN
UNIT D SERGEANT	SGT. KNEPPER	INTAKE	PRATZ	
UNIT D(A)	YOST	PROPERTY SERGEANT	SGT. WALTERS 6-2	
UNIT D(B)	VANGUILDER	SALLY PORT SERGEANT	SGT. KSENICH	
UNIT E SERGEANT	SGT. HEDGLIN	TRANSPORT	SHAW	
UNIT E(A)	PEREZ	TRANSPORT	LASTOWSKI	
UNIT E(B)	PIZZARO	HEARING ESCORT	YURCAK	
UNIT F SERGEANT	[REDACTED]	VISITING ROOM-1	CLOSED	
UNIT F(A)	MALDONADO	VISITING ROOM-2	CLOSED	
UNIT F(B)	KRACHKOWSKI	VISIT SEARCH-HEARINGS	THOMAS	
UNIT G	C. FRY	VISIT PROCESS	DEMARTINIS	
UNIT G	WEBB	ZONE 1 ROVER	ZILLMAN	
RHU SERGEANT	SGT. SCALISE	ZONE 2 ROVER	SHATTO	
RHU SAYERS	RHU GAINES	ZONE 3 ROVER	WILKES	
RHU T. IRWIN	RHU ARKWRIGHT			
PERIMETER CAM. MONITOR	DEFORCE			6-2: 8-4:
UNIT I SERGEANT	SGT. ZINZ	[REDACTED]	[REDACTED]	[REDACTED]
UNIT I	P. PETERSON	WHITNEY / HENDRICKS	SGT. WALMSLEY CL 8	MORALES MED/HW 8
UNIT I	BYERLY		SGT. DUDA CP 8	
UNIT J SERGEANT	SGT. BARTON	[REDACTED]	SGT. SCHAEF DH 8	
UNIT J	McCUNE	SHAW / LASTOWSKI	KINDLE SO 8	
UNIT J	LINDSEY		RANDALL CP 8	
UNIT J	MITCHELL	[REDACTED]	HUNT CP 8	
YARD SGT: SGT. EDDY	YARD SGT: SGT. GREEN	SGT. RHOADES	SPURLOCK CP 8	
1. FIKE	2. T. WHEELER	SABOL / F. MORALES OT 8	ENDRES M 8	
3. EDMUNDS	4. BLISS P4		MALEC CP 8	
5. BETTS	6. TILLER	[REDACTED]	L. GREER P 8	
7. OCHALEK	8. HEWITT	LT. THERIAULT	SGT. WERTZ CP 8	
9. GREBINER			CLEMENT CP 8	
GATE: SHEETS	MED LINE: YARNELL		HARRIS CP 8	[REDACTED]
WALK: FARLEY	WALK/RUN: PORTERFIELD		RICE C 8	
OSP: J. DELANEY	RISP: GRINNELL		WEST CN 8	
SEARCH TEAM	WILLIAMSON / WYDRO			
SEARCH TEAM	GADLEY / NICHOLS			
MED LOBBY	McDANIEL			
INFIRMARY	BARTOE / MARCH P3			
UTILITY OFFICER	KAUFMANN			
OUTSIDE HOSPITAL	BAUGHMAN			

INMATES BEGINNING SHIFT _____

INMATES IN _____

YARD COUNT:

INMATES OUT _____

0800

/

INMATES END OF SHIFT _____

0855

/

SHIFT CMNDR GOING OFF DUTY

1300

/

1355

/

SHIFT CMNDR COMING ON DUTY

1800

/

REVIEWED BY

1900

/

FIRE / SECURITY / HEALTH / SANITATION

2000

/

SATISFACTORY? YES _____ NO _____

CORRECTIVE ACTIONS TAKEN: _____

EXHIBIT "B"